

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ORIGINAL

ALLEN MORSLEY,
petitioner

CASE# 1:01-cv-1003

VS.

DONALD ROMINE,
respondent

FILED
HARRISBURG, PA

DEC 10 2001

PETITIONERS RESPONSE TO RESPONDENTS MOTION
FOR ENLARGEMENT OF TIME PURSUANT TO FED.R.
OF CIVIL PROCEDURE , 6 (b) .

MARY E. D'ANDREA, CLERK
Per [Signature]
Deputy Clerk

NOW COMES , the petitioner , Allen Morsley proceeding Herein pro se, hereby moving this Hon. Court to **Compell** Counsel For the Respondent to Now **Show "Proof"** that Counsel **Who Prosecuted Petitioners Case** (Christine B. Hamilton) Was **Authorized** to Practice **Law** at the **Time** of petitioners **Trial** Under **North Carolina State Law** ' And Further That She is **Now Authorized** To Practice Under North Carolina State **Law** , As Well as North Carolinas state **Bar Assossiation**. As petitioner Has **Alleged** that Counsel who prosecuted his Case Was **Not Authorized** ' (See Motion For Discovery , And **Request For Admissions**).

2. Petitioner Further Objects to the Idea that Counsel For the Respondent **May** Find it ' Necessary to **Request** The United States Attorneys Office in the Eastern District of North Carolina To **Respond** to the Allegations of Petitioners **Claim** , As the petitioners Case Has been **Recorded** , And Is A Matter Of Record.
3. **Further** if this Honorable Court Does Not Find **Any Merit** to petitioners wish for and **Unbiased /Hearing / Trial / O(r) Order**. Petitioner Moves This Honorable Court to **Order** North Carolina District Attorneys Office to **First** Send the petitioner A **Copy "** Of the **Entire Trial Transcripts"** Along with any **Statements** or **exhibits** that May Be **Relied Upon"** So that this Honorable Court Might See Petitioners Case **on the Same** Leveled Feild .

STANDARD OF REVIEW

Pro se, Submissions, "However" inartfully Pleased" Must be held to Less Stringent Standards than formal pleadings that are Drafted By a Lawyer. HAINES vs. KERNER , 404 U.S. 519 , 30 Led.2d. 652, 92 Sct. 594 ; SEE LEWIS vs. ATTORNEY GENERAL OF THE UNITED STATES, 878 F.2d. 714, 722 n. 20 (3rd. Cir. 1989); SMALL vs. LEHMAN , 98 F3d. 762, 776 (3rd. Cir.96)

" Finally, where a pro se, Complaint Contains " potentially cognizable Claims, a plaintiff should be Allowed to Particularize the claim.

SEE COLEMAN vs. PEYTON, 340 F2d. 603, 604 (4th. Cir. 1965); GORDON vs. LEEKE, 574 F2d. 1147, 1151, (4th. Cir. 1978); THEN vs I.N.S. cite as 58 F. supp. 2d. 422 (D. N.J. 1999).

RESPECTFULLY SUBMITTED THIS DAY Nov. 29, 2001

Mr Allen Morsley 14718056
MR , ALLEN MORSLEY # 14718056
F.C.I. EDGEFIELD
P.O BOX 724
EDGEFIELD SC. 29824.

CERTIFICATE OF SERVICE

I Certifie that i am the petitioner in the Case of Allen Morsley
vs. Donald Romine . And that on this Day Nov. 29, 2001

I Have Placed a copy of the Following in the Mail to be severed upon
Counsel for the Respondent . PETITIONERS RESPONES TO RESPONDENTS MOTION
FOR ENLARGEMENT OF TIME , PURSUANT TO FED. R. OF CIVIL PROCEDURE 6(b).

MARTIN G. CARLSON , UNITED STATES ATTORNEY.
MATHEW E. HAGGERTY, ASS. UNITED STATES ATTORNEY.

228 Walnut Street , 2nd Floor,
Harrisburg Pa. 17108.


MR ALLEN MORSLEY 14718056.